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Christian Copyright
Licensing International, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Christian Copyright Licensing International, LLC,

Plaintiff/Counterdefendant,

vs.

Multitracks.com, LLC,

Defendant/Counterclaimant.

Case No. 2:23-cv-00368-DWL

**PLAINTIFF'S OBJECTIONS
TO DEFENDANT'S FIRST
SUPPLEMENTAL
PRELIMINARY PRETRIAL
DISCLOSURE**

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(B), Plaintiff Christian Copyright Licensing International, LLC (“CCL”) objects to the following documentary evidence identified in Multitracks.com, LLC’s (“MTC”) First Supplemental Preliminary Pretrial Disclosure served on April 8, 2024.

1.	All filings and exhibits filed, lodged, or served in the uniform domain name dispute resolution action before Forum having file number FA2211002020063. (Bate Stamped MT000001-MT000230)	Untimely for failure to comply with Case Management Order; for Defendant’s filings only, relevance, hearsay, authenticity, Rule 403
2.	USPTO filings for the MULTITRACKS.COM trademark Application Serial No. 87659447	Untimely for failure to comply with Case Management Order; relevance, hearsay, authenticity, Rule 403
3.	Accounting documents reflecting amounts expended on marketing using Multitracks.com trademark from 2013 to present. (MT00596-602)	Untimely for failure to comply with Case Management Order; hearsay, foundation, Rule 1006
4.	YouTube videos from artist endorsements (available at https://www.multitracks.com/sessions/)	Untimely for failure to comply with Case Management Order; relevance
5.	Consumer Communications stamped MT00325-00497 (produced as Confidential—Counsel’s Eyes Only)	Untimely for failure to comply with Case Management Order; relevance, hearsay, authenticity, Rule 403
6.	Consumer Group Facebook Messages stamped MT000498-000595 (produced as Confidential—Counsel’s Eyes Only)	Untimely for failure to comply with Case Management Order; relevance, hearsay, authenticity, Rule 403
7.	Ross MultiTracks.com receipt—Ross Deposition Ex. 17	Untimely for failure to comply with Case Management Order; relevance
8.	Go Daddy Who is information—Ross Deposition Ex. 19	Untimely for failure to comply with Case Management Order
9.	Resource Websites—Ross Deposition Ex. 22	Untimely for failure to comply with Case Management Order; relevance, hearsay, authenticity
10.	USPTO Official Gazette Notice of Allowance	Relevance; Rule 403; Rule 1005
11.	CCLI Extension of Time to Oppose	Relevance; Rule 403; Rule 1005
12.	Cunningham Expert Report	Rule 702; Rule 703; Relevance; Rule 403; Hearsay

13.	Any document identified by Plaintiff	No objection.
14.	Any expert report and supporting data	All objections reserved, given that Defendant has not yet disclosed any expert reports or supporting data.

Dated: May 10, 2024

Loeb & Loeb LLP

By: /s/ Andrew M. Hutchison

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Christian Copyright

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